

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	
v.	:	Civil No.
\$4,370.00 in U.S. CURRENCY,	:	
Defendant.	:	

: : : : : :

VERIFIED COMPLAINT FOR FORFEITURE

Plaintiff, the UNITED STATES OF AMERICA, by its attorneys, Rod Rosenstein, United States Attorney for the District of Maryland, and Stefan D. Cassella, Assistant United States Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is a civil forfeiture action against United States currency which was furnished or intended to be furnished in exchange for a controlled substance or listed chemical, or constituted proceeds traceable to an exchange of controlled substances or moneys used to facilitate a violation of 21 U.S.C. § 841, and therefore should be forfeited to the United States of America pursuant to 21 U.S.C. § 881(a)(6).

THE DEFENDANTS *IN REM*

2. The defendant property consists of \$4,370.00 in United States currency (hereinafter, the "Defendant Property").

3. The Defendant Property was seized on November 20, 2013, from Adam Tajfar, pursuant to a search of his residence at 107 Washington Street, Lutherville-Timonium, in the State and District of Maryland.

JURISDICTION AND VENUE

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the Defendant Property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 21 U.S.C. § 881.

5. This court has *in rem* jurisdiction over the Defendant Property under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

6. Venue is proper in this district pursuant to 28 U.S.C. § 1395 because the property is located in this district.

BASIS FOR FORFEITURE

7. The Defendant Property is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because it constitutes: (1) money, negotiable instruments, securities and other things of value furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; (2) proceeds traceable to such an exchange; and (3) money, negotiable instruments, and securities used and intended to be used to facilitate a violation of the Controlled Substances Act.

FACTS

8. The forfeiture is based upon, but not limited to, the evidence outlined in the attached Declaration of Dennis W. Maye, Special Agent of the Drug Enforcement Administration, which is incorporated herein by reference.


WHEREFORE, THE Plaintiff prays as follows:

1. That any person or persons having any interest therein be cited to appear herein and answer the Complaint;
2. That a Warrant of Arrest *in rem* issue to the United States Marshal commanding the arrest of the Defendant Property;
3. That Judgment of Forfeiture be decreed against the Defendant Property;
4. That upon Final Decree of Forfeiture, the United States Marshal dispose of the Defendant Property according to law;
5. That the Plaintiff have such other and further relief as the case may require.

Dated: June 9, 2014

Respectfully submitted,

Rod J. Rosenstein
UNITED STATES ATTORNEY
District of Maryland


Stefan D. Cassella
Assistant United States Attorney
36 South Charles Street
Fourth Floor
Baltimore, Maryland 21201
Tel: (410) 209-4800

DECLARATION

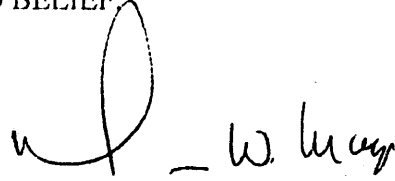
This affidavit is submitted in support of a complaint for forfeiture of \$4,370.00 in United States currency.

I, Dennis W. Maye, Special Agent of the Drug Enforcement Administration, submit that there are sufficient facts to support a reasonable belief that the \$4,370.00 in United States currency constitutes: (1) money, negotiable instruments, securities and other things of value furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; (2) proceeds traceable to such an exchange; and (3) money, negotiable instruments, and securities used and intended to be used to facilitate a violation of the Controlled Substances Act in violation of 21 U.S.C. § 841 and thus is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

- a. In or about May 2013, members of the Baltimore County Police Department (BCPD) received a complaint of persons selling marijuana on Washington Street in Baltimore County, Maryland.
- b. The subjects involved were identified as Adam Tajfar and Andrew Tajfar, living at 107 Washington Street, Lutherville-Timonium, Maryland.
- c. Investigators with the BCPD made three positive trash pulls from this residence.
- d. On November 20, 2013, investigators with the BCPD executed a search and seizure warrant at 107 Washington Street. Reza Tajfar, the father of Adam and Andrew Tajfar, answered the door.
- e. Adam Tajfar and Kelly Steigerwald were found in the front left bedroom.
- f. Kelly Steigerwald does not live at this residence. She was visiting her boyfriend, Adam Tajfar.
- g. Investigators saw Andrew Tajfar coming from the master bathroom where he had attempted to flush evidence down the toilet.
- h. Tammy Tajfar, the mother of Adam and Andrew Tajfar, was found in the master bedroom.
- i. After investigators explained the warrant and advised the occupants of their rights, Adam Tajfar told the officers that he had money in a safe located in his bedroom.
- j. Adam Tajfar then provided the combination for the safe.
- k. When asked about drugs in the house, Andrew Tajfar said that what was in the toilet belonged to him, and that he also had some stuff in a jewelry box.

- l. From the master bathroom investigators recovered a large bag that contained a large wax paper and a heat sealed bag, both of which contained a wax-type substance.
- m. From the master bedroom investigators recovered a digital scale, a plastic container that contained a yellowish residue, two pipes with residue, and a paper with residue.
- n. From Andrew Tajfar's bedroom investigators recovered a zip lock bag that contained white powder. This item was found in a jewelry box.
- o. From Adam Tajfar's bedroom investigators recovered: a pipe with residue; multiple bags with residue; three digital scales (one with a waxy residue); a bag with a red jelly-like substance; a bag containing a metal tray with residue; a metal pick with residue; wax paper with a wax-type substance; a bag containing a crystal-like substance; a bag of marijuana; a zip lock bag containing a white residue; a plastic jar with yellowish residue; four (4) pieces of an orange pill; a gun; ammunition; and \$4,370.00 in United States currency.
- p. The currency was found in Adam Tajfar's safe.
- q. From a mobile home located on the property, investigators recovered a freezer bag with residue, and a white powder.
- r. Adam and Andrew Tajfar were arrested and charged with felony drug violations.
- s. Adam Tajfar has been arrested prior to this incident; however, this is his first drug charge.
- t. In this case, Adam Tajfar was charged with possession with intent to distribute a controlled dangerous substance, possession of marijuana, possession of a controlled dangerous substance - not marijuana, and possession of drug paraphernalia.
- u. Andrew Tajfar has been arrested prior to this incident and charged with obstructing and hindering, possession of marijuana, and possession of drug paraphernalia.
- v. In this case, Andrew Tajfar was charged with possession with intent to distribute a controlled dangerous substance, possession of marijuana, possession of a controlled dangerous substance - not marijuana, and possession of drug paraphernalia.
- w. A check made through Maryland State Wage and Records revealed that Adam Tajfar has no reported legitimate income in the State of Maryland.
- x. A check made through Maryland State Wage and Records revealed that Andrew Tajfar has no reported legitimate income in the State of Maryland.
- y. The \$4,370.00 in United States currency located in Adam Tajfar's bedroom was seized as drug proceeds.

I DECLARE UNDER PENALTY OF PERJURY PURSUANT TO TITLE 28 U.S.C. § 1746 THAT THE FACTS SUBMITTED BY THE BALTIMORE COUNTY POLICE DEPARTMENT, IN REFERENCE TO THE SEIZURE OF \$4,370.00 IN UNITED STATES CURRENCY FROM ADAM TAJFAR ARE ACCURATE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

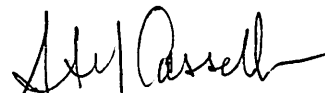
A handwritten signature in black ink, appearing to read "Dennis W. Maye", written over a horizontal line.

Dennis W. Maye
Special Agent
Drug Enforcement Administration

VERIFICATION

I, Stefan D. Cassella, declare under penalty of perjury as provided by 28 U.S.C. § 1746, that the foregoing Verified Complaint for Forfeiture is based on reports and information furnished to me by the Drug Enforcement Administration and that everything contained therein is true and correct to the best of my knowledge and belief.

Dated: June 9, 2013



Stefan D. Cassella
Assistant United States Attorney

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U.S. Department of Justice
United States Marshals Service


PROCESS RECEIPT AND
RETURN

PLAINTIFF UNITED STATES OF AMERICA	COURT CASE NUMBER
DEFENDANT 4,370.00 in U.S. CURRENCY	TYPE OF PROCESS Verified Complaint in Rem
SERVE ↓ AT	NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
	GD-14-0098 / 14-DEA-593837
	ADDRESS (Street or RFD, Apartment No., City, State, and ZIP Code)

SEND NOTICE OF SERVICE TO REQUESTER AT NAME AND ADDRESS BELOW:	Number of process to be served with this Form - 285	
Jennifer Stubbs, FSA Paralegal Specialist U.S. Attorney's Office 36 S. Charles Street, 4th floor Baltimore, Maryland 21201	Number of parties to be served in this case	
	Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Address, All Telephone Numbers, and Estimated Times Available For Service)

Arrest property. Fill in the date of arrest in this process receipt and return our copy.

Signature of Attorney or other Originator requesting service on behalf of: 	TELEPHONE NUMBER 410-209-4800	DATE 6/9/14
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SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process No. _____	District of Origin No. _____	District to Serve No. _____	Signature of Authorized USMS Deputy or Clerk _____	Date _____
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I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc. at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below).

Name and title of individual served (If not shown above).				<input type="checkbox"/> A person of suitable age and discretion then residing in the defendant's usual place of abode.		
Address (complete only if different than shown above)				Date of Service		Time am pm
				Signature of U.S. Marshal or Deputy		
Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount Owed to US Marshal or	Amount or Refund

REMARKS:

PRIOR EDITIONS MAY BE USED

SEND ORIGINAL + 2 COPIES to USMS.

1. CLERK OF COURT 2. USMS Record 3. Notice of Service 4. Billing Statement 5. Acknowledgment of Receipt

MEMORANDUM

DATE: June 9, 2014

TO: Kristine Cupp
U.S. Marshal Service

FROM: Jennifer Stubbs
Paralegal Specialist
U.S. Attorney's Office - District of Maryland

RE: **U.S. v. \$4,370.00 in U.S. CURRENCY**

Civil Action No.

CATS ID - 14-DEA-593837
Agency Case No. – GD-14-0098

The United States has filed a forfeiture action against **\$4,370.00 in U.S. CURRENCY** .
A copy of the Complaint for Forfeiture is attached.

Notice of this seizure will be published at www.forfeiture.gov pursuant to Rule G of the
Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims.

Thank you.

Attachment